

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

UNITED STATES OF AMERICA

v.

ADAM DALE ISAACKS

§
§
§
§
§

Crim. No. 1:22-CR-121

ELEMENTS OF THE OFFENSE

You are charged in Counts One, Two, Five and Seven of the first superseding indictment with a violation of 18 U.S.C. § 2423(a), Transportation of Minors.

The essential elements which must be proven, beyond a reasonable doubt, to establish the 18 U.S.C. § 2423(a) violation are:

1. The Defendant knowingly transported individuals in interstate commerce;
2. At the time of the transportation, the individuals were less than 18 years old; and,
3. At the time of the transportation, Defendant intended that the individuals would engage in unlawful sexual activity.

Respectfully submitted,

DAMIEN M. DIGGS
UNITED STATES ATTORNEY

/s/ Rachel Grove

Rachel Grove
Assistant U. S. Attorney
Eastern District of Texas
Texas Bar No. 24058440
550 Fannin, Suite 1250
Beaumont, Texas 77701
(409) 981-7961
Rachel.grove@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was delivered by electronic delivery to defendant's attorney on the 21st day of June 2023.

/s/ Rachel Grove

Rachel Grove

Assistant U. S. Attorney